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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

IMMUNE PHARMACEUTICALS INC.,
et al.,

Debtors.

Case No. 19-13273 (VFP)

Chapter 7

Jointly Administered

Hearing date: Dec. 7, 2021 at 10:00 AM

**NOTICE OF MOTION OF JEFFREY A. LESTER, CHAPTER 7 TRUSTEE,
FOR APPROVAL OF SETTLEMENT AND MUTUAL RELEASE AGREEMENT**

PLEASE TAKE NOTICE that Jeffrey A. Lester, Chapter 7 Trustee (the “Trustee”) for the bankruptcy estates of Immune Pharmaceuticals Inc. (the “Debtor”) and its subsidiaries, shall pursuant to Bankruptcy Rule 9019 and Local Bankruptcy Rule 9019-3 move before this Court on December 7, 2021 at 10:00 AM or as soon thereafter as counsel may be heard for entry of an order approving a certain Settlement and Mutual Release Agreement between and among the Trustee on behalf of the bankruptcy estates, Discover Growth Fund, LLC, certain directors and officers of the Debtor, and Argonaut Insurance Company.

PLEASE TAKE FURTHER NOTICE that the Trustee relies upon the Certification and Brief filed herewith.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Bankruptcy Rule 9013-2(a), any opposition to the Motion must be filed and served within 7 days of the hearing date.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Bankruptcy Rule 9013-3(d), the Motion will be decided on the papers unless opposition is filed.

Dated: Nov. 9, 2021
Livingston, New Jersey

RABINOWITZ, LUBETKIN & TULLY, LLC
Attorneys for Jeffrey A. Lester, Chapter 7 Trustee

By: /s/ Jonathan I. Rabinowitz
JONATHAN I. RABINOWITZ